

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**DENNIS GROMOV**, individually and  
on behalf of all others similarly situated,

Plaintiff,

v.

**BELKIN INTERNATIONAL, INC.**,

Defendant.

Case No. 1:22-cv-6918

Judge Valderrama

Magistrate Judge Fuentes

**DECLARATION OF JASON A. IBEY IN SUPPORT OF PLAINTIFF'S  
MEMORANDUM IN OPPOSITION TO DEFENDANT BELKIN INTERNATIONAL,  
INC.'S MOTION FOR ENTRY OF PROTECTIVE ORDER PERMITTING  
ATTORNEYS'-EYES-ONLY DESIGNATION**

I, Jason A. Ibey, declare:

1. I am an attorney admitted to the State Bar of California on November 26, 2012, and have been a member in good standing since that time. I am also admitted to the Northern District of Illinois as of February 3, 2023.
2. I am a partner with the law firm Kazerouni Law Group, APC, and co-counsel for plaintiff Dennis Gromov ("Mr. Gromov").
3. I have personal knowledge of the following facts and, if called upon as a witness, could and would competently testify thereto, except as to those matters which are explicitly set forth as based upon my information and belief and, as to such matters, I am informed and believe that they are true and correct.
4. The parties met and conferred telephonically on March 6, 2024 concerning Defendant's pending motion.

5. I am writing this declaration in support of the Plaintiff's Opposition to Defendant's Motion for Entry of Protective Order Permitting Attorneys'-Eyes-Only Designation.
6. As of March 19, 2024, several third-party retailers that Mr. Gromov subpoenaed in this matter for sales data have produced sales data to Mr. Gromov's counsel pursuant to the current confidentiality protective order in this matter, without requiring an attorneys'-eyes-only provision.
7. Attached hereto as **Exhibit A** is a true and correct copy of Defendant's initially proposed draft of a modified confidentiality protective order to add an attorneys'-eyes-only designation, which was provided by Defendant's counsel to Plaintiff's counsel via email on October 31, 2023.
8. Attached hereto as **Exhibit B** is a true and correct copy of Plaintiff's proposed edits to Defendant's initially proposed draft of a modified confidentiality protective order to add an attorneys'-eyes-only designation, which document was provided by Plaintiff's counsel to Defendant's counsel via email on March 6, 2024.

I declare under penalty of perjury that the foregoing is true and correct, executed on March 19, 2024, pursuant to the laws of the United States of America, at St. George, Utah.

Respectfully submitted,

/s/ Jason A. Ibey  
Jason A. Ibey